P-999/M-93-33 ORDER APPROVING CHANGES TO CURRENT DIALING PLAN

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair Commissioner Commissioner Commissioner Commissioner

In the Matter of the Minnesota Telephone Association's Petition for Changes to the Current Dialing Plan ISSUE DATE: September 21, 1993

DOCKET NO. P-999/M-93-33

ORDER APPROVING CHANGES TO CURRENT DIALING PLAN

PROCEDURAL HISTORY

On January 18, 1993, the Minnesota Telephone Association (MTA) filed a petition on behalf of all Minnesota local exchange carriers (LECs) to change the dialing plan currently used by most LECs in Minnesota.

The Commission received comments on February 22, 1993 from the Department of Public Service (Department), Vista Telephone Company (Vista), MCI Telecommunications Corporation (MCI), Schneider Communications Inc. (SCI), and AT&T Communications of the Midwest (AT&T. The Commission received reply comments on March 4, 1993 from MTA, the Minnesota Business Utility Users Council (MBUUC), and U S West Communications Corporation (U S West. The Department submitted additional comments on April 15, 1993. The MTA filed reply comments on May 18, 1993.

This matter came before the Commission on June 15, 1993.

FINDINGS AND CONCLUSIONS

Telephone numbers in the United States are currently based on the North American Numbering Plan (NANP or the Plan). Each telephone number in the Plan has 10 digits divided into three parts: (1) the three digit "area code"; (2) the three digit "central office code;" and (3) the four digit "station number." The middle number in the area code must be a one or a zero, which distinguishes it from the central office code which uses two through nine as the first two digits. The four digit station number may use any number, zero through nine. This format yields 152 useable area codes, 640 central office combinations within each area code, and 10,000 individual telephone numbers within each central office code.

New and increasing service demands, spurred in part by population growth, have nearly exhausted the numerical combinations available under the current dialing format. Indeed, all the remaining area codes have been assigned and will be put into service by the end of 1993. The new dialing plan proposed by the Minnesota Telephone Association (MTA) would provide the additional number combinations needed to avoid any shortage of telephone numbers in the foreseeable future.

MTA's plan would implement interchangeable central office and area codes, which allows telephone companies to use area code number combinations as central office codes. Adopting interchangeable codes would, for example, allow companies to use the current 218 area code in Northeast Minnesota as a central office code within the 612 area code. The MTA proposal would also require customers to dial 1 plus the full ten digit number for all toll calls, even those originating and terminating in the same area code. These changes are consistent with the international guidelines established by the North American Number Plan Administrator (NANPA or Plan Administrator). The Plan Administrator has, in fact, already adopted interchangeable central office and area codes to be implemented on January 1, 1995. Three states served by U S West have already implemented the changes proposed by the MTA.

The Commission considers MTA's proposed plan to be the simplest and least disruptive of all the viable alternatives. Generally, only toll calls within the same area code will be affected by the MTA plan. Nonetheless, the plan will represent a change from long-standing dialing practices to which customers are accustomed. Therefore, the Commission expects the MTA to follow through on its proposal to file a customer education plan with the Commission on or before November 1, 1993.

The Commission recognizes that there are significant costs involved in implementing the proposed dialing plan. These costs are associated principally with office equipment rearrangements, administrative changes (e.g., updating directories, modifying support systems), and customer education efforts. Mankato

¹ MTA's proposed plan would add approximately 4 million numerical combinations, 1.5 million in each area code.

² A toll (long distance) call within a particular area code currently requires the caller to dial 1 plus the seven digit number of the called party. MTA's plan would require the same caller to dial 1 plus the area code before dialing the seven digit telephone number. Extended Area Service (EAS) calls would still only require customers to dial the seven digit number.

³ Arizona, Washington, and Oregon have adopted 1 plus ten digit dialing for all toll call and interchangeable area/central office codes. Arizona implemented interchangeable codes in 1990, Washington implemented the same in 1992.

Citizens Telephone Company (Mankato) and East Otter Tail Telephone Company (East Otter Tail) have submitted cost estimates for implementing the MTA dialing proposal. These costs will be well under one dollar per access line. The Commission considers these costs acceptable given the compelling need to provide the additional numerical combinations necessary to meet the rising demand for telephone service. The cost of the MTA plan will not exceed the cost of any other available option. However, the Commission is concerned that the implementation costs of some companies may be significantly higher that others. Therefore, the Commission will require companies to file cost information with the Commission if their direct implementation costs exceed five dollars per access line.

There is no doubt that the current numbering system must be modified to meet the needs of consumers. The Commission finds that the MTA proposal is the simplest, least disruptive and best alternative available to meet this need. It is consistent with the North American Plan Administrator's guidelines and has already been implemented in several other jurisdictions. The impact on customers will be eased by an effective education plan, which the MTA will file before the new numbering system is put into effect. The required filing for companies with implementation costs in excess of the five dollar threshold will help guard against excessive costs that may be associated with the implementation of this plan by some companies.

ORDER

- 1. The Commission hereby approved the dialing plan proposed by the Minnesota Telephone Association.
- 2. The Minnesota Telephone Association shall file its proposed customer education plan with the Commission on or before November 1, 1993.
- 3. All local exchange companies shall, on or before December 31, 1993, file a schedule of proposed investments and expenses associated with implementation of the MTA plan if the cost of implementation will exceed \$5 per access line.
- 4. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Susan Mackenzie Acting Executive Secretary

(S E A L)